


SEALED**REDACTED
COPY****FILED**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION


JAN 20 2021

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

VS.

OSCAR ROJAS-MORALES (1)
AND


Defendant(s).

CRIMINAL NO.:



INDICTMENTCt. 1: 18 U.S.C. §§ 922(a)(6) and 2
False Statement to a Firearms Dealer and
Aiding and AbettingCt. 2: 18 U.S.C. § 922(a)(6), False
Statement to a Firearms Dealer

THE GRAND JURY CHARGES:

SA21CR0033 OG**COUNT ONE****[18 U.S.C. §§ 922(a)(6) and 2]**

On or about November 2, 2019, in the Western District of Texas, Defendants,

OSCAR ROJAS-MORALES (1)**AND**


aided and abetted by each other, in connection with the acquisition of a firearm, to wit, a Glock model 23, .40 caliber pistol, serial number ABNK695 and a Glock model 29, 10mm pistol, serial number BLFG586, from Americana Arms, LLC, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Americana Arms, LLC which statement was intended and likely to deceive Americana Arms, LLC as to a fact material to the lawfulness of such acquisition of the said firearms by the defendant under chapter 44 of Title 18, in that  , at the direction of Defendant Rojas-Morales, did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that

██████████ was the actual buyer of the firearms indicated on the Form 4473, when, in fact, as Defendants then knew, ██████████ was not the actual buyer of the firearms in violation of Title 18, United States Code, Sections 922(a)(6) and 2.

COUNT TWO
[18 U.S.C. § 922(a)(6)]

On or about November 2, 2019, in the Western District of Texas, Defendant,

██████████, in connection with the acquisition of a firearm, to wit, a Zastava model PAPM92 PV, 7.62 caliber pistol, serial number Z92-000792, from LTC AIM4IT Ranges, LLC, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to LTC AIM4IT Ranges, LLC which statement was intended and likely to deceive LTC AIM4IT Ranges, LLC as to a fact material to the lawfulness of such acquisition of the said firearms by Defendant under chapter 44 of Title 18, in that Defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that Defendant was the actual buyer of the Zastava model PAPM92 PV, 7.62 caliber pistol, serial number Z92-000792, indicated on the Form 4473, when, in fact, as Defendant then knew, Defendant was not the actual buyer of the Zastava model PAPM92 PV, 7.62 caliber pistol, serial number Z92-000792, in violation of Title 18, United States Code, Section 922(a)(6).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

I.

Firearms Violations and Forfeiture Statutes

[Title 18 U.S.C. § 922(a)(6) and 2, subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the criminal violation set forth in Counts One and Two, the United States of America gives notice to Defendants, [REDACTED] AND OSCAR ROJAS-MORALES, of its intent to seek the forfeiture of the properties described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

Title 18 U.S.C. § 924. Penalties

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (a)(6) . . . of section 922 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . .

This Notice of Demand for Forfeiture includes but is not limited to the following properties:

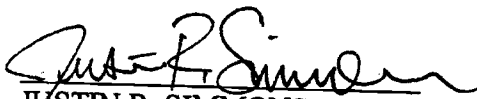
1. Zastava model PAPM92 PV, 7.62 caliber pistol, serial number Z92-000792;
2. Glock model 23, .40 caliber pistol, serial number ABNK695;
3. Glock model 29, 10mm pistol, serial number BLFG586; and Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses.

A TRUE BILL

[REDACTED]
FOREPERSON OF THE GRAND JURY

GREGG N. SOFER
UNITED STATES ATTORNEY

BY:


JUSTIN R. SIMMONS
Assistant United States Attorney